



Program Reviews Lessons Learned

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Introduction



- ✓ Review performed by Office of Enforcement to evaluate contractor's program for identifying, screening, reporting, tracking and correcting noncompliances
- ✓ Not an investigation



Introduction (*cont'd*)



✓ Objectives:

- Encourage effective ID and reporting
- Enhance uniformity
- Determine effectiveness
- Develop lessons learned

✓ Enforcement Program Plan describes approach used



Implementation



- ✓ First Round - 2000 through 2003
- ✓ Second Round – 2004 to present
- ✓ Second Round scheduling reflects a variety of factors



Implementation (*cont'd*)



First Round

- ✓ Significant deficiencies, gaps
- ✓ Observed maturation during first round

Second Round

- ✓ Raised the bar – expect all elements in place
- ✓ Emphasis on assessments, cause analysis – mandatory elements
- ✓ Results - 18 completed, 15 improved or maintained



Lessons Learned



- ✓ Intent to summarize global strengths and weaknesses
- ✓ Program review reports more detailed, available on webpage
- ✓ www.hss.energy.gov/enforce/



Lessons Learned *General Implementation*



- ✓ Overall - significant improvement in formality of procedures, level of implementation and consistency of programs
- ✓ Nuclear Safety training target audience expanded
- ✓ Enforcement coordinators lacking adequate authority and accessibility to upper management
- ✓ Subcontractors not always integrated into the program



Lessons Learned *Identification and Screening*



- ✓ Move to centralized issue-tracking systems provide better information capture and trending
- ✓ Typically a wide variety of information sources are being reviewed
- ✓ In general, appropriate screening decisions are being made



Lessons Learned

Identification and Screening (cont'd)



- ✓ Basis for screening decisions not always well documented
- ✓ De-centralized programs leading to inconsistent information flow and screening
- ✓ Failure to capture noncompliances corrected on-the-spot



Lessons Learned *Evaluation of Reportability*



- ✓ Reporting based on event thresholds typically done well
- ✓ Information content needs improvement
- ✓ Repetitive/programmatic issues not consistently recognized – trending still a concern
- ✓ Site review processes don't always ensure that 20-day guidelines are met



Lessons Learned

Cause Determination/Corrective Actions

- ✓ Increasing use of extent-of-condition and effectiveness reviews
- ✓ NTS closure processes typically rigorous, include independent validation
- ✓ Increased use of formal drivers for cause analysis



Lessons Learned

Cause Determination/Corrective Actions (cont'd)

- ✓ Cause analysis not always identifying all significant causes
- ✓ Recurring deficiencies indicate that problem causes are not being accurately identified and corrected



Lessons Learned *Assessments*



- ✓ Continuing Office of Enforcement focus area
- ✓ Strength – SR FEB process for conducting Independent Assessments
- ✓ Assessment programs not always in place or effective at finding issues



Lessons Learned *Assessments (cont'd)*



- ✓ Findings not always entered into quality problem tracking system
- ✓ Formal training for management assessors not consistently implemented



Lessons Learned *Program Assessments*



- ✓ Significant improvement
- ✓ Use of visiting Enforcement Coordinators
- ✓ Benchmark against other sites using Program Review Reports



Lessons Learned *10 CFR 835 Audits*



- ✓ Credit taken for DOE audits
- ✓ Use of unqualified assessors
- ✓ Performance issues – not all areas completed, nor performance-based



Future Activities



- ✓ Complete second round of reviews
- ✓ Continue table top reviews
- ✓ Update EPP
- ✓ Potential contractor self-regulation